

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PENG WANG, QINLIN LI, and YISI
WANG,

Plaintiffs,

v.

KEN PAXTON, Attorney General of Texas,
in his Official Capacity, only.

Defendant.

Case No.

DECLARATION OF ANDRE Y. BATES

I, Andre Y. Bates, being of competent mind and over the age of 18, declare as follows:

1. I am a member in good standing of the State Bar of California, serving as Of Counsel at DeHeng Law Offices, P.C. (“DeHeng”) and a special counsel for Chinese American Legal Defense Alliance (“CALDA”) in this case. I am co-counsel for the named Plaintiffs and putative class members in this case. I submit this declaration in support of Plaintiffs’ motion for class certification.

2. In my role as Of Counsel for DeHeng, I am responsible for handling a wide range of complex legal matters, including class action litigation such as the present case.

3. Over the course of more than 25 years of practice, I have served as lead or co-counsel in numerous complex litigation matters in both state and federal courts, including mass tort and class action lawsuits. Examples of relevant cases include:

- a. *County of Orange v. Merrill Lynch & Co.* (C.D. Cal.): Case No. 19STCV32729 (Los Angeles Super. Ct.): Member of the legal team for the defendant in a

fraud and breach of fiduciary duty case involving \$500 million in investments arising from one of the largest municipal bankruptcies in U.S. history.

- b. *Signature Group Holdings Inc. (Fremont Reorganizing Corp.) v. David Crisp, et al.* (E.D. Cal.): Co-counsel for the plaintiff in an action arising from a large-scale mortgage fraud scheme involving the use of straw buyers to inflate home prices and extract fraudulent equity.
- c. *Kairy, et al. v. SuperShuttle Int'l., et al.* (N.D. Cal.): Co-counsel for the defendant in a class action brought by current and former franchisee drivers alleging misclassification as independent contractors.

4. In recent years, my practice has increasingly focused on representing plaintiffs in federal administrative actions, class actions, and private attorney general enforcement cases. Notable examples include:

- a. *Zhuoer Chen, et al. v. Kristi Noem, et al.*, United States District Court for the Northern District of California Case No. 25-cv-03292-JSW (N.D. Cal.): Lead counsel in a constitutional challenge resulting in a nationwide preliminary injunction.
- b. *Ting Peng, et al. v. Nicholas A. Mastroianni II, et al.*, No. 9:20-cv-80102 (S.D. Fla.): Co-counsel in a case resulting in final approval of a class action settlement.
- c. *Vicki A. Jones, et al. v. Hertz Local Edition, et al.*, Case No. BC587664 (Los Angeles Super. Ct.): Co-counsel in a wage-and-hour class action resulting in final settlement approval.

d. *Effirama Quayson v. DFS Group L.P.*, Case No. 19STCV32729 (Los Angeles Super. Ct.): Co-counsel in a consumer class action resulting in final settlement approval.

5. I have no interests that are adverse to or in conflict with the interests of Peng Wang, Qinlin Li, Yisi Wang, or the putative class members.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed at Rancho Cordova, California, on July 2, 2025.

/s/ Andre Y. Bates

Andre Y. Bates